SEP 23 1982 Prachok file

REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY . RICHMOND, VIRGINIA 23261

September 20, 1982

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Andrew L. Praschak Attorney - Enforcement Division U. S. Environmental Protection Agency Region II 26 Federal Plaza New York, New York 10278

> Re: York Oil Company Moira, New York

Dear Mr. Praschak:

This is to acknowledge receipt of the letter from Warren H. Llewellyn, Director - Enforcement Division, dated August 23, 1982, addressed to our Massena Reduction Plant, concerning Reynolds Metals Company's alleged involvement with the York Oil Company of Moira, New York.

Our Massena Reduction Plant has made a diligent search of its internal files that could reasonably be expected to contain documents bearing on any transactions between the plant and the York Oil Company, and has come to the conclusion that, to the best of its knowledge, Reynolds Metals Massena Reduction Plant has never disposed of any wastes with York Oil Company, Moira, New York.

We will, of course, be willing to further discuss this matter with you. For further information or clarification you can contact Mr. Steve Ryan at (804) 281-3952 or myself at (804) 281-3871.

Lawrence C. Tropea, Jr., L.E.
Director of Environmental Control
Environmental Control Department

LCT/yh

570046

Reynolds Metals Company Facility Description

The Reynolds Metals Company, St. Lawrence Reduction Plant, located in the Town of Massena in St. Lawrence County, was constructed in the 1950's and began operation in 1959. In general, the facilty operates three shifts per day, seven days a week with continuous production. In 1975, there were approximately 850 employees; in 1984 there were 800. The plant produces primary aluminum (up to 130,000 tons per year) via electrolytic reduction of aluminum oxide to primary aluminum. This process, also known as the Horizontal Pin Soderberg process, takes place in 504 cells or "pots". Production of aluminum alloys takes place in 9 casting furnaces located in the casthouse. In 1975 the primary aluminum production rate was 355 tons/day; the aluminum alloy production rate was 250 tons/day. Each day's production in the potrooms requires 700 tons of aluminum oxide, 175 tons of carbon electrode, and 13 tons of cryolite. casthouse produces a variety of aluminum alloys with silicon, iron, copper, magnesium, and manganese as normal additives to molten aluminum from the potrooms. The facility also engaged in the production of electrodes for electrolytic uses, and the production of cryolite from spent potliner.

References

- Koelling, H.R. 1975. Compliance Monitoring Report for Reynolds Aluminum, Massena. NYSDEC.
- Rice, A.R.C. 1984. SPDES 24-Hour Compliance Sampling Inspection Report for Reynolds Metals Co. Inc. NYSDEC.

Storage Tanks at Reynolds

According to the facility's Spill Prevention Control and Countermeasure (SPCC) Plan (1977), there were eleven (11) storage tanks at the facility. The contents of each tank, the tank volume capacities, and whether each tank was below or above ground is listed below.

Tank Content	Tank Volume	Above- or Under-
	(in Gallons)	Ground
#6 fuel oil	432,000	above
#6 fuel oil	432,000	above
#2 fuel oil	20,000	above
#2 fuel oil	10,000	under
diesel fuel	3,000	under
gasoline	10,000	under
transformer oil	10,000	above
transformer oil	10,000	above
transformer oil	10,000	above
transformer oil	1,000	above
waste oil	4,000	under

During the TSCA Inspection (10-15-81) DeLisle stated that the 4,000-gallon underground tank contained 960 gallons of waste lube and hydraulic oil. The tank is no longer used and was not used for 3 months prior to the inspection. A sample (#57837) taken by EPA from the tank was analyzed for PCBs, 67 ppm total PCBs were found. The tank was resampled by EPA and analyzed; this time the analysis showed 55 ppm. During the May, 1982 inspection, Mr. DeLisle claimed they had sampled the tank and had found 35 ppm.

Equipment at Reynolds

Equipment at the facility in which PCB-containing fluids may have been used includes the following:

- o South Vertical Casting Unit
- o North Vertical Casting Unit
- Ajax Induction Furnace Rodding Room
- o Anode Pin Straightener
- o Anode Channel Straightener
- o Cast House Pot Shell Repair
- o HTM System (Heat Transfer System)
- o Tysman Saw Table
- o Loma Saw
- o Crucible Cleaner
- o Oil Circuit Breaker

Heat Transfer System (HTM System)

4,000 gallon capacity in 1977 (SPCC Plan) 6,000 gallon capacity in 1981 (1981 Annual PCB Report)

Retrofilled in 1972. (C. Bent: effort to remove PCB oils) Sampled in 1978, found 3.15 % PCBs (31,500 ppm)

Even though TSCA required a retrofill in 1979, it was not done until 1981. Reynolds claims they delayed because they were waiting for approval of an Annex I incinerator for disposal of drained and flushed materials. Rollins Environmental Systems was contracted to remove the PCB fluids (2.3 tons) from the retrofill in June, 1981.

System tested in 1981: 7800 ppm

Subsequent retrofill in 9/81

Tested again in 10/81: 3700 ppm (violated 3 month operation requirement)

During May, 1982 TSCA inspection, DeLisle stated that there were plans to retrofill the HTM system again in 1982, and that levels in the system at the time were ~1500 ppm.

As of Jan, 1984, Reynolds had performed four retrfills at a cost of \$210,000. Most recent testing indicated < 50 ppm.

Transformers

1977: Pyranol A 13 B was used in approx. 20 1000-KVA substation transformers.

Capacitors

1977: approx. 50 sealed capacitors used for induction heating furnaces

- o estimate 2 qts. oil/capacitor
- o estimate 1 doz used capacitors discarded to company landfill in plant's history, last capacitor landfilled approx. 2 years ago, no longer landfill them.

Miscellaneous Equipment

Reynolds says the processes that generate waste oil are primarily the ones involved with mobile equipment lubrication and maintenance. Reynolds claims to have 160 pieces of equipment on site. Examples of mobile equipment include 2 tractors, ore dollies, kalamazoos, fork lifts, and trucks. Examples of stationary equipment and machinery include gear boxes, lube systems, and metal cutting devices. According to supplemental answers to the first set of interrogatories supplied by Reynolds, several pieces of mobile equipment were found to contain PCBs.

Disposal of Waste Oils/Fluids by Reynolds

DATE	AMOUNT	FLUID	DESTINATION	REASON
03/71	2955 lbs	Pyranol (GE #A13B3B)	Monsanto Sauget, IL	excess inventory
06/71	4700 lbs	Pyranol GE (GE #A13B3B)	Monsanto Sauget, IL	excess inventory
11/71	5200 lbs	Pyranol	Monsanto Sauget, IL	excess inventory
06/72	~7500 gal	Therminol FR	Monsanto St. Louis	heat transfer system retrofill
06/72	~7500 gal	Flushate (MCS-681)	Monsanto St. Louis	heat transfer system retrofill
10/78	7 drums	transformer fluid	Rollins Env. Sys.	PCB transformer puncture accident
10/78	120 drums	contaminated solids	Rollins Env. Sys.	PCB transformer puncture accident
1976- 1977	7800 gal per yr	waste oil	Northeast Oil Service Sycamore, NY	unknown
1977- 1980	7800 gal per yr	waste oil	Southgate Oil Service Syracuse, NY	unknown
1980- 1981	unknown	waste oil	C & J Syracuse, NY	unknown
1981	unknown	HTM drainage oils	Rollins (incineration)	unknown
1981	unknown	Solid wastes	CECOS	unknown
01/82	unknown	Capacitors & HTM drainage	ENSCO El Dorado, AK	unknown
6/81	3592 gal	Therminol	unknown	unknown
9/81	3312 gal	Therminol	unknown	unknown
1/82	636 gal	Therminol	unknown	unknown
9/82	4219 gal	Therminol	unknown	unkņown
4/83	3978 gal	Therminol	unknown	unknown

Hydraulic/Heat Transfer Fluids Purchased by Reynolds *

DATE	AMOUNT		FLUID	PCB CONTENT
Heat Transf	er Fluid	1:		
1971	12,000	ļbs	Therminol FR-1	100% Aroclor 1242
1970-71	18,000	lbs	Therminol FR-2	100% Aroclor 1248
Hydraulic F	luid:		· .	
1970-71	37,200	lbș	Pydraul 135	9.5% Aroclor 1232 36.5% Aroclor 1242
1971-72	18,470	lbs	Pydraul 135-A	27.8% Aroclor 5432
1970-71	8,110	lbs	Transform Pyranol Al3B3B	45.0% Aroclor 1260
1971	25,500	lbs	DISC PCB PCT	unknown
12/06/78	540	gal	Therminol	none
10/08/79	540	gal	Therminol	none
02/27/80	540	gal	Therminol	none
12/08/80	540	gāl	Therminol	none
05/23/81	7,665	gal	Therminol	none
09/19/81	540	gal	Therminol	none
12/31/81	540	gal	Therminol	none
08/11/82	3,962	gal	Therminol	none
03/01/83	3,794	gal	Therminol	none

^{*} All fluids listed were purchased from Monsanto

PCBs Measured at Reynolds: Samples Taken by EPA

Number	Date	Location	Result (ppm)
23462		oily residue from drip pan at base of left HTM circulating pump	A 1248: 376 A 1254: 284 TOTAL: 660
57837	10-15-81 🔏	underground waste oil storage tank (stopped using 3 mo. prior)	A 1260: 67
		Kraft requested reanalysis 5-26-83 for 6/1/83 settlement conference.	A 1260: 55
•	,	Reynolds analyses	35 (total)
57836	10-15-81	small tank being used to store waste oils (hydraulic and lube oils) sampled top black oil phase and bottom clear amber phase	BDL (in both)

Note:

Reynolds analytical services performed by:

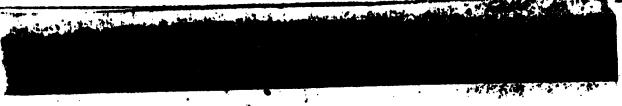
- O'Brien and Gere, Syracuse, NY 1982 Reduction Research

Documented Waste Oil Pickups by Pierce from Reynolds

A total of 8550 gallons of "waste oil" was picked up from Reynolds by Pierce brothers between 11/74 and 10/76:

Date	<u>Gallons</u>
11-11-74	2300
06-25-75	1400
08-13-75	1200
10-27-76	2500
10-27-76	~200 + 1400 gal wate
10-28-76	950
	·
TOTAL	8550





Tel WAlten | 8-0500



PEIRCE BROS. OIL SERVICE, Inc.

Collectors of Waste Oil + Oil Tank Cleaning AII WAVERLEY OAKS ROAD WALTHAM SA, MASS.

Movember 16, 1953

The Herry Contracting Service is to cut down, transport and erect a 100,000 gallon tank at Moirs, New York, within a period of one month weather permitting for a price of \$3100.00.

The Merry Contracting Service has the use of Pairce Bros. 011 Service, Inc. welder.

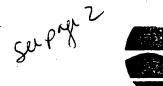
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EASE COMPLETE AND RETURN TO THE ABOVE ADDRESS, ATTENTION: INDUSTRIAL CHEMICAL SURVEY.

INDUSTRIAL CHEMICAL SURVEY







)MP/	ANT NAME					SIC CODE (II K	nown)	OFFICE U	SE ONLY
?ey	nolds Metals Company		CITY Massena			3334		11	
	ANY MAILING ADDRESS O. Box 500	C				STATE NY	ZIP CODE 13662		
ANT	NAME (If different)	CONTACT N		DeLisle			TELEPHO: Area 3	NE 15-764-62	33
ANT	T ADDRESS (If different) eet	C	ITY			STATE		ZIP CODE	
:NC	IPAL BUSINESS OF PLANT ectrolytic reduction of aluminum c	ore					•		
OTE:	(If parent company, give name and addresses of all div and submitted for each.)	isions, subsidi	aries, e	tc. located in	New York Sta	ite. A separate que	stionnaire	is to be compl	eted
							20 m at 2 m at 2 m		
			PART rge 1	'll nformatio	n				
	Does your plant discharge liquid wastes to Name of System	to a municipa	ally ov	vned sanitar	y sewer s	ystem?		Yes	⊠ No
•	2. Is your facility permitted to discharge liq Federal (NPDES) permit?	uid wastes u	ınder a	State (SPD) Permit Nu		000:	1 3 2	Yes	□ No
raier	3. Do you discharge liquid wastes in any oth Explain	her manner?	••••			1,		∵i□ Yes -!	⊠ No
4	If any of the above are "Yes": a. Do you discharge process or chemical contact cooling water and scrubber wat b. Do you discharge non-contact cooling v. Do you discharge collected storm drain d. Do you discharge sanitary wastes only	ter)? water? nage only? .	• • • •		• • • • • •		 	· IX Yes	□ No□ No□ No
AIR —	1. Does your facility have sources of possib 2. Enter Location and Facility Code as show	n on your Ai	r Pollu	ıtion			1 1	Yes	☐ No
≪	Control Application for Permits and Certif	fication (If a	pplica	ble) [4]	0 5 8	8 9 0	0 9 0	일 :	
	1. List Name and Address of Firm (Including	yourself) re	movin	g wastes oth	er than of	fice and cafeter	ria refus	e. 	
STES	C & J	Syracu	ıse	State _{NY}	13264e	Waste O	il	1	
LIQUID WASTES	Address	ity		State	Zip Code			Act	Inactive
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3011	on site				<u> </u>				
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PESTICIDES	Manufacture Pesticides or Pesticide F Produce Pesticides or Pesticide Produ		nts?	• • • • • • •				Yes Yes Yes Yes	区区区 20 20 20 20 20 20 20 20 20 20 20 20 20
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(Refer to attached TABLE I)

Complete all information for those substances your facility has used, produced, stored, distributed or otherwise disposed of since January 1, 1971. Do not include chemicals used only in analytical laboratory work. Enter the name and code from Table I. If facility uses a substance in any of the Classes A — F which is not specified in the list, enter it as code class plus 99, e.g. 899 with name, usage, etc.

NAME OF SUBSTANCE	CODE	AVERAGE ANNUAL USAGE	AMOUNT NOW ON HAND	CAL.	ر / ا	PURPOSE OF USE (State whether produced, reacted, blended,
	-			Ú	+	packaged, distributed, no longer used, etc
Freon 12	A05	150	30	上	X	
Freon 22	A05	270	90		X	Dr
Freon 114	A05	720	330	Τ	X	"
Coal Tar (Pitch)	EOl	36,000,000	Varies	T	x	Process Electrodes
PCP X LANGUAGE TO THE PARTY OF	A21+	ANO MELL	15,0343	x	117	Primarily*Contaminated Oils
Aluminum	м99	252,000,000	Varies	T	х	Production Process
Silicon	м99	3,622,744	Varies	Τ	x	Alloying
Copper	M06	1,450,221	11	T	X	(1
Magnesium	м99	733,187	69	T	X	П
Chromium	MO5	22,353		1	x	11
Nickel	MQ9	20,600	10	T	x	
Zinc	M13	212,752	"	T	х	**
Beryllium	MO.3	948	11	T	x	11
Manganese	м99	91,881	ıſ		x	**
Strontium	м99	868	lt.		Х	11
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If you use chemicals of unknown composition, list trade name or other identification, name of supplier and complete information.

	AVERAGE		(1/)			PURPOSE OF USE (State whether produced, reacted
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Betz 35A	25,000	29,245]	Betz	Labs, Inc.	Raw Water Treatment
Betz 65	615	2,460	 ,	Betz	Labs, Inc.	Raw Water Treatment
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t hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

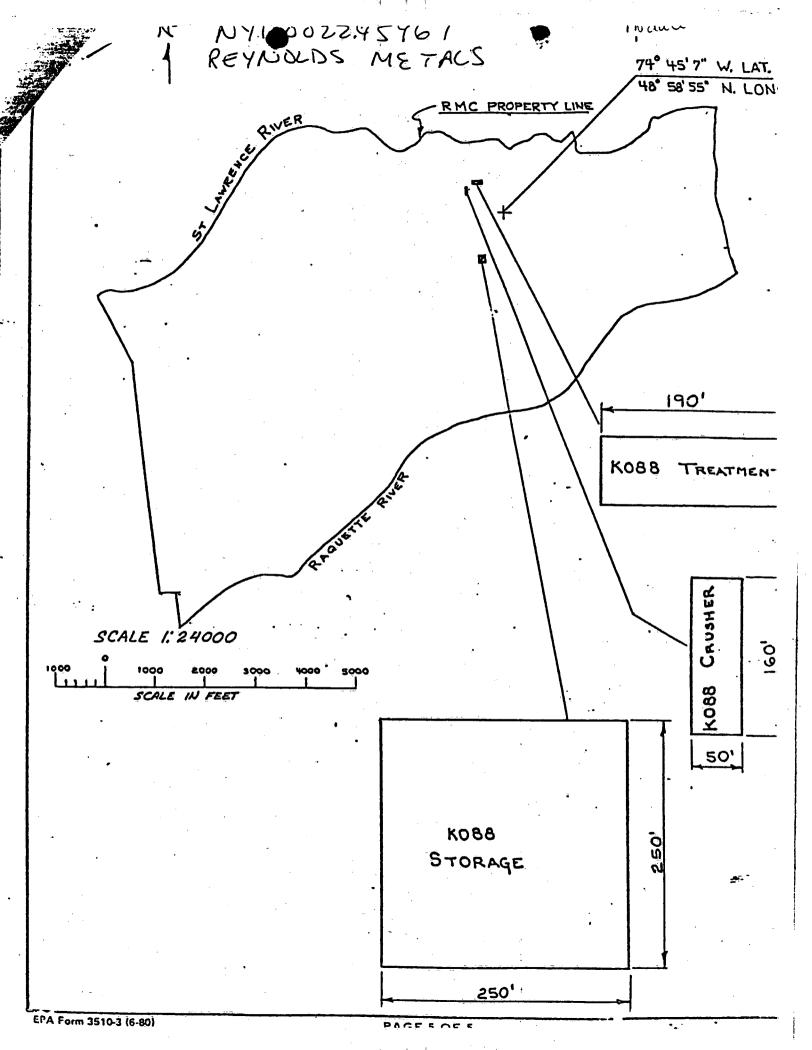
SIGNATURE(Owner, Partners, or Officer)
Stemple D. Scow

81-06-25

IAME (Primed or Typed)
Temple N. Brown.

Vice President Corporate Operations Services

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Pierce Pickups at Rynolds

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INVOICE IN []] COMS ON DAY ST IMPAIRT ":

BETHOLOS METALS COMPANY Your Mekup BETHOLDS METALS COMPANT GAOS SEVER BOAD P. O. BOX 500 MASSENA, NEW YORK 1342 MASSENA, NEW YORK COOL LIE BEQUIEED AT CESTINATION PAYMENT TERMS is keautred Cur Plant QUANTITY #114 CDOU DESCRIPTION UNIT PRICE TOTAL AMOU blaker own To covor reserval of mosto oll for a one year. portod lavencer 1,774 through October 1975. Oil will be accumulated at a rate of approxiunderground tank from which it can be purped. This oil will be removed periodically by you during the period covered by this braur. Mr. Faul Cabo or Don Kannady will assist you in this removal. There will be no charge to Reynolds Metale Company for this certice. The mate oil will go out on our Miscellaneous Shipping Order 1418-14393. Confirming order to Paul Sears on 11/11/74. State and Crunty texes not applicable. ep Excapt #54-0395135 this purchase order is subject to the conditions and stipulations on the reverse side of this sheet and/or attached here'd. THACHO ZIATELA SCIONYER



REYNOLDS HETALS COMPANY

	. St.	Lawrence Pla	int		
1	•	PLAN	T		
REYNOLDS ORDER NO	2947 MA	CUSTOMER ORDER NO.		DATE 6-2	5 - 75
SRIP TO	: Peirce Oil				
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RETHOLDS HETALS COMPANY

St Lawrence Plant

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REYNOLDS HETALS COMPANY

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REYNOLDS HETALS COMPANY

St. Law Plant

NSO/MA 15517 CUSTOMER ORDER NO. DATE 10-27-76 ship to: Peirce Oil STREET NO. Moria CITY N.Y. STATE TIME TRUCK NO. SHIPPED TIME DRIVER RECEIVED MOUNT BESCRIPTION MET WEIGHT GROSS .. 1400 gals approx of water. 200 gals ABOVE ITEMS RECEIVED IN GOOD ORDER. SIGNED: Their Truck No. ORM R-433.2 (REY. 1.56)

BEYNOLDS HETALS COMPANY

			Low Plant	w T				
	BETHOLD	. 4912 MA	CUSTOMER	•	.			
	- VANOTE - N	, 1744 PM	CADER NO.		DATE 10-2	<u>8-75</u>		
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Reynolds

York Oil Moira, NY => Administrative Record

reviously le 1) a pages: 2) 4 pages:	Pierce Oil four	de pickup /:lle	the iolas /	Ray molds 1
z) 7 pages	liene Oil tree Waste Oil	picked up by F	the iolas /	Ray molds 1
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- Contract renewed in Oct : 75 to cover period from

-- 11175 to 10176.

